



## DISABILITY AND COMMUNICATION ACCESS BOARD

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### INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all buildings and facilities constructed by, or on behalf of the State or any county, shall conform to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-217, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

**Docket:** **DCAB 2004-13:** Does door hardware with the characteristic functions equivalent to ANSI F04, F09, F81, F82 comply with the ADAAG, Section 4.13.9 Hardware?

**Summary:** The current ADAAG Section 4.13.9 does not address the characteristic functions of accessible door hardware. ADAAG 4.13.9 states that handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching or twisting of the wrist to operate. These types of door hardware have two operating options. Accessibility is dependent on how the door is locked on the inside. The first option complies with ADAAG 4.13.9 and DCAB's Interpretive Opinion AAC 93-50.552 as long as the latchbolt operating mechanism is disengaged and remains unlocked for use. The second option is not ADAAG compliant per DCAB 2004-12 because it requires the use of one hand to use a key involving tight pinching & twisting of the wrist to disengage the locking mechanism and the other hand is used to push or to pull the door open. The use of this type of characteristic function requires the facilities owner and/or users to establish, implement, and maintain a policy to ensure the door is compliant with the ADAAG.

**Ruling:** For buildings or facilities subject to HRS § 103-50,

#### **ADAAG 4.13.9**

Door hardware with a hardware function that allows a push/turn button to lock the outside lever that requires two hands to operate (one to hold, pinch and twist a key to disengage the latch bolt, and one hand to open the door at the same time) complies with ADAAG, Section 4.13.9 only when the push/turn button is disengaged to allow the outside lever to be unlocked. When the push/turn button is not disengaged, and the lever is always locked or rigid, the door hardware does not comply with the ADAAG, Section 4.13.9.

[Rul: 07/04] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call 586-8121.

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